

2000 CGB-CC-0258

Received & Inspected

MAY 17 2012

FCC Mail Room

Christ for the Crisis
P.O. Box 6
Fulton, MS. 38843

Dear Sirs,

We are applying for a Closed Captioning Exemption for Christ for the Crisis Ministry for one thirty minute, weekly program on WTVA, Ch. 9, Tupelo, MS. This program airs at 8:30 am Sunday mornings. Our case identifier is CGB-CC-0258.

I want to thank you for the closed captioning exemption that our ministry "Christ for the Crisis" has benefitted from in recent years. I also want to thank you for the opportunity to restate our case why closed captioning will put a substantial burden on our ministry.

Our weekly program on WTVA, Ch.9, costs us \$400.00 per week - we have enclosed a typical bill for September from WTVA. If we do all the labor of transcribing a program, WTVA will do the closed captioning for \$100.00 per program (paperwork enclosed). We have no paid staff - hours of transcribing will have to be done by us. The 25% increase in cost from \$400.00 to \$500.00 will cause a substantial financial burden.

If we contract with a professional company to save the hours of labor, we increase our financial cost even more. CPC - Computer Prompting and Captioning Co. Of Rockville Pike, MD will charge us \$255.00 for transcript and Caption on our 30 minute program with a 10 day turnaround (paperwork enclosed). A shorter turnaround means a higher rate. At best, we will have a 64% increase in our cost per program from \$400.00 to \$655.00.

Another company, Closed Caption Maker, charges \$150.00 for a Cced Beta Sp, which is sent to the station (paperwork enclosed). This would be a 38% increase from \$400.00 to \$550.00, but gives us no shelf-life for the program to be run later. The ability to run a program as a rerun helps us with production cost.

Another company, Aberdeen, in Rancho Santo Margarita, CA, wants \$350.00 per 30 min program (paper work included). This increases our cost 88% from \$400.00 to \$750.00.

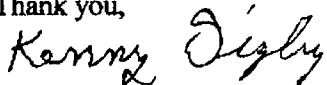
Because Christ for the Crisis is a faith ministry supported by love offerings, we have no "sponsors." Whereas other programs can secure a sponsor who pays for closed captioning, we do not have that option.

We have provided you with a bank statement for the month of Oct. 4 - Nov 3, 2011. This reflects our total assets, income, and expenditures. Of \$4,640.00 paid out to all stations, Check # 2023 went to WTVA, Ch. 9, for \$1800.00. The balance went to radio stations and low power local TV stations and local access channels on cable systems. Our end of the month balance of \$13,333.00 is typical of our ministry. All our labor is voluntary with no paid staff. Every dollar is used to pay for production, station time, and correspondence.

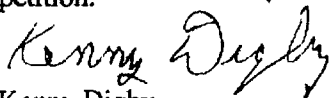
We have been on WTVA, Ch. 9, since they started - the 4th Sunday in March, 1957. My eighty-six year old parents, Eugene and Ellen Digby, started this ministry when I was four years old and they continue to be part of the program and ministry. "Christ for the Crisis" is truly a "Mom and Pop" ministry. For nearly fifty-five years, we have been blessed to maintain this one weekly program. We did it live until 1968, then went to pre-recorded programs. Closed Captioning will be a big change for our small, local, longstanding ministry.

Doing closed captioning for one program that airs on one station is as expensive and requires the same work as doing closed captioning for a program on fifty stations, but the closed captioning expense for them is a small percentage of their total cost - it is a huge percentage of our cost. The larger ministry can cut one station and cover closed captioning for the other 49, but we only have one station that requires closed captioning. This huge increase in weekly expense could threaten a fifty-five year relationship with WTVA, Ch 9 Tupelo or mean the canceling of other radio stations. We appreciate any consideration you can give us for an exemption.

Thank you,


Kenny Digby

I am signing the above petition you received with documentation on January 18, 2012, under penalty of perjury. According to Roger Holberg, (Attorney, Disability Rights Office, Consumer and Governmental Affairs Bureau), this satisfies the affidavit or sworn statement concerning our petition.


Kenny Digby

Christ for the Crisis
5-16-12

UPDATE - Additional Information

We enclosed a September, 2011, bill from WTVA, Ch. 9, that showed our weekly rate for 30 minutes to be \$400.00 (Paragraph 3 in original petition). We are currently paying \$425 (Invoice included for January 2012) - a \$25 increase per week for our 30 minutes under the new contract. Absorbing a \$25.00 per week increase is typical for our faith-based ministry but absorbing a \$250.00 increase per week would threaten a 55 year ministry.

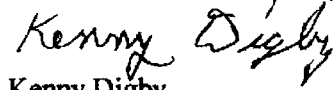
We pay our bills at the end of each month with love offerings from churches, families, and friends. In 55 years, we have had no sponsors who underwrite the expense of the ministry (paragraph 7 of petition). If we gave credit or public recognition for financial support on the program (written or oral), we would need to do so for all – why should those who “pay” for closed captioning get public recognition when none of our other supporters have gotten credit or recognition for 55 years.

NEVERTHELESS, with my father’s blessing (Eugene Digby - the 86 year old founder of this ministry in 1957), I have communicated this possible financial increase of \$250.00 each week in numerous church services where I have been a guest speaker, in our local association of 37 congregations, in numerous prayer services with ministers and laymen, and in various public gatherings of potential and current supporters of this ministry. I have done this ever since we were first notified we would have to file a new petition for a Closed Captioning Exemption. I have shared this possible financial increase with numerous business men. No one has responded in any way.

Our balance on all financial assets in April 2011, was \$15,000.00. Our balance in October 2011 was \$13,333.00. Our balance in April 2012 with all bills paid was \$15,000.00 We spend what comes in - we have been stable financially with very little change for 15 years. Absorbing a \$200-\$250 increase per week would put a huge burden on our small budget. All our labor (including the time and effort on this petition) is voluntary. There are no salaries, expense accounts, or even office space - our family does this (and has done it for 55 years) out of our homes because we love this ministry - Christ for the Crisis - A Work of Faith and Labor of Love. We trust the Lord Jesus to see us thru and are praying for you in your decision.

Thank you for your assistance and consideration.

This is being signed under penalty of perjury.


Kenny Digby
5-16-12

P.S. We are requesting that the billing invoices (September 2011 and January 2012) from WTVB, Ch. 9 be kept confidential as a courtesy to them.



WTVA
P.O. BOX 350
Tupelo, MS 38802
ph: (662) 842-7620
fx: (662) 842-6342

Christ for the Crisis
P.O. Box 6
Fulton, MS 38843

Advertiser Christ for the Crisis (1308)
Agency Direct Account (1)
Buyer Digby, Kenny
Salesperson Spain, Dee (1011)
ph: (662) 842-7620
fx: (662) 842-6342x
Product Religious (1074)
Brand Christ for the Crisis (1126)
Acct Types Local/Pd Prog Direct
Est/Headline /
Demo
Revision
Comments

Invoice 242358
Inv Date 1/31/2012
Terms Due upon receipt
Contract 76326
Bill Type Calendar
Period 1/1/2012 - 1/31/2012

CO-OP/Order Type No/Normal
Package
Gen. Date 2/1/2012 9:08:18AM

AdM

Tupelo-9 (WTVA)

OFFICIAL BILLING INVOICE

Line	Type	Scheduled	Schedule Days to Run	Air Time	Length	Program	Copy/Sec	Amount	Remarks
1.0	Contract Line Reamark								
1.0	LONG	8:30AM- 9:00AM	Day, Su-1	01/01/12 8:30AM (Su)	29:00	CHRIST FOR THE CRISIS		\$425.00	
1.0	LONG	8:30AM- 9:00AM	Day, Su-1	01/08/12 8:30AM (Su)	29:00	CHRIST FOR THE CRISIS		\$425.00	
1.0	LONG	8:30AM- 9:00AM	Day, Su-1	01/15/12 8:30AM (Su)	29:00	CHRIST FOR THE CRISIS		\$425.00	
1.0	LONG	8:30AM- 9:00AM	Day, Su-1	01/22/12 8:30AM (Su)	29:00	CHRIST FOR THE CRISIS		\$425.00	
1.0	LONG	8:30AM- 9:00AM	Day, Su-1	01/29/12 8:30AM (Su)	29:00	CHRIST FOR THE CRISIS		\$425.00	
							Gross Total	\$2,125.00	Total Spots 5
							Commission	\$0.00	
							Net Total	\$2,125.00	